



U.S. Department of Justice

United States Attorney
Southern District of New York

300 Quarropas Street
White Plains, New York 10601

May 10, 2021

VIA ECF AND EMAIL

Honorable Cathy Seibel
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: *United States v. Mehdi Moslem et al.*, 18 Cr. 547 (CS)

Dear Judge Seibel:

The Government respectfully submits this letter in advance of the final pretrial conference scheduled for May 12, 2021. As a result of stipulations reached between the parties, and in attempt to streamline the presentation of evidence in the Government's case-in-chief, the Government no longer plans to introduce evidence of the following:

1. Evidence of misrepresentations in Saaed Moslem's 2006 application for a homeowner's insurance policy. (*See* Dkt. 78 at 20-23).
2. Evidence of the defendants' state tax returns (*see* Dkt. 78 at 26), except for certain years as to which the parties have reached stipulations regarding admissibility.
3. Evidence concerning Customer-2's purchase of a car from Exclusive, including instructions by Saaed Moslem to inflate assets and leave off rent payments in Customer-2's car loan application. (*See* Dkt. 78 at 28-29).

Finally, in light of a witness's stated unwillingness to travel to New York for trial during the pandemic, the Government no longer plans to proceed on Count Four of the Second Superseding Indictment.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney

by: /s/
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cc: Counsel of Record (by ECF)